



City of Anaheim  
**PUBLIC UTILITIES DEPARTMENT**

California Energy Commission

**DOCKETED**

**13-RPS-01**

**TN 71848**

**AUG 16 2013**

August 16, 2013

California Energy Commission (CEC)  
Dockets Office, MS-4  
RE: Docket No. 13-RPS-01  
RPS Proceeding  
1516 Ninth Street  
Sacramento, CA 95814-5512

Via Email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**RE: The City of Anaheim Comments to the California Energy Commission's Renewable Portfolio Standard (RPS) Implementation for Local Publicly Owned Electric Utilities (POU's) in response to the July 29, 2013 Workshop**

In response to the July 29, 2013 Lead Commission Workshop for Renewables Portfolio Standard (RPS) Implementation for Local Publicly Owned Utilities (POU's) the City of Anaheim (Anaheim) respectfully submits the following comments for review and consideration.

**Duplication of Reporting**

As mentioned in previous comments, Anaheim is requesting that the CEC work closely within its organization to stream line its reporting requirements. Currently, the many reports required by the CEC contain duplicative information. CEC staff mentioned at its July 29<sup>th</sup> workshop that an effort is underway to create a centralized database; however, this database is not expected to be in place until well into the second compliance period. A centralized database will help ease reporting efforts, and will help to lessen the amount of time and expense to compile the data and submit the reports. As such, Anaheim encourages the CEC to focus its efforts on developing this database as quickly as possible.

*Page 1 of 3*

*Approved for Signature and Seal: [Signature] Date: [Date] Title: [Title]  
The undersigned is the duly authorized official of the City of Anaheim, California.  
[Signature]*

Duplicative information required by the CEC is contained in the following reports:

1. Integrated Energy Policy Report;
2. AB 162 Report (Power Source Disclosure); and
3. 1306 Report.

A detailed list of overlap in the reporting requirements is provided in Appendix A to these comments, titled “CEC Duplicative Reporting Requirements.”

#### **Concerns with CEC Reports and Templates**

CEC staff has laudably developed templates for POUs to demonstrate compliance with SBX1 2; however, the templates need further refining. In their current form, the templates are difficult to navigate, making the reporting process overly tedious. Moreover, the data being requested will have already been submitted to the CEC through other reporting requirements, namely the AB 162 Report and the IEPR.

Please see Appendix B to these comments, titled “Detailed Comments on CEC Reporting Templates,” for comprehensive comments on each Reporting Template.

#### **Concerns with WREGIS**

Anaheim has concerns with the requirement to submit e-tag data to WREGIS. The RPS Guidebook did not require POUs to list details on RPS WREGIS ID in the Miscellaneous Field of the e-tags until October 2012. Anaheim requests that e-tags be required only after October 2012.

Additionally, tagging errors can and do occur by no fault of the POU receiving the energy. To maintain the investment made by POU customers in renewable resources, the CEC must have a mechanism in place to ensure that any Renewable Energy Certificates (RECs) that are not accepted by WREGIS due to e-tagging errors will be accepted and counted toward POU compliance targets.

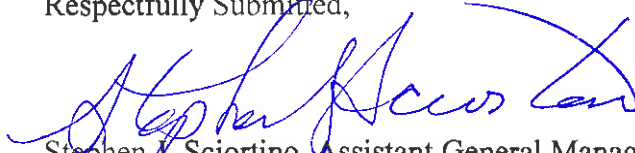
E-tag information supplemented by other sources of data (namely WREGIS RECs and Settlements Quality Data, already submitted in the AB 162 Report) can provide an alternate source for verification.

## **Conclusion**

Anaheim appreciates the opportunity to submit comments in response to the July 29, 2013 Lead Commission Workshop for RPS Implementation for Local Publicly Owned Utilities.

Should you have any questions, please contact me.

Respectfully Submitted,



Stephen J. Sciortino, Assistant General Manager, Joint Services  
City of Anaheim, Public Utilities Department  
ssciortino@anaheim.net  
714.765.5177

# Appendix A: CEC Duplicative Reporting Requirements

The Integrated Energy Policy Report (IEPR), the CEC AB 162 Report and the CEC 1306 Report provide data that is requested in the RPS Compliance Templates. Appendix A provides additional detail on the types of duplicate data requested in the CEC Compliance Templates. Anaheim recommends the creation of a centralized database, where the CEC will only ask for this data once, so that duplicative reporting efforts will be minimized.

Below is information on the types of data submitted under various CEC reporting requirements.

1. Integrated Energy Policy Report (IEPR).
  - a. The IEPR is a large report. If it is requested, Anaheim will be happy to forward it.
  - b. Due every other odd year
  - c. Demand Forms include data on:
    - i. Retail Sales (historical and forecasted)
      1. This data is also requested in the AB 162 Report and the 1306 Report
    - ii. Load for the System and Peak (historical and forecasted)
  - d. Supply Forms include data on:
    - i. Information on Long Term Contracts
      1. This include long term and PCC 0 and PCC 1 renewable contracts
      2. This information includes
        - a. Resource Name
        - b. Resource Type (renewable, etc.)
        - c. Fuel Type
        - d. Contract Start/End
        - e. Contract Term
    - e. Similar data is requested in the CEC\_RPS Compliance Spreadsheet
2. AB 162 Report- Power Source Disclosure
  - a. Please see attached Report “AB 162 Report (City of Anaheim)” and AB 162 Report (City of Anaheim-Green Power Program)”
  - b. Due June 1<sup>st</sup>, Annually
  - c. Schedule 1 of this Report includes data on energy procured for the prior calendar year and also includes information on:
    - i. Name of Facility
    - ii. Fuel Type
    - iii. Location
    - iv. CEC RPS Certification #
    - v. WREGIS ID #

## **Appendix A: CEC Duplicative Reporting Requirements**

- vi. EIA ID #
  - vii. CEC Plant ID #
  - viii. Gross kWh purchased or generated
  - ix. Total Retail Sales
- d. Similar data is requested in the CEC\_RPS Compliance Spreadsheet
- 3. CEC 1306 Report
  - a. Due Quarterly
    - i. Information on Retail Sales
  - b. Similar data is also requested in the CEC\_RPS Compliance Spreadsheet

## **Appendix B: Detailed Comments on CEC Reporting Templates**

Anaheim is pleased to submit comments on the RPS Compliance Reporting Templates. The comments are embedded into the Compliance Reports, attached (in PDF format and excel).

Below are notes on the Compliance Reporting Templates:

1. File Name: POU\_RPS Compliance Spreadsheet (APU Comments)
  - a. Please see Anaheim notes in tab “Notes for Anaheim Comments”
2. File Name: CEC-RPS\_Hourly (APU Comments)
  - a. This workbook is protected, so adding comments was difficult.
  - b. Anaheim added a comment in Tab “CEC-RPS-Hourly Instructions” to clarify that this workbook is only for PCC 1 contracts that are not directly connected to a CBA
    - i. This Template inaccurately refers to compliance with the RPS Eligibility Guidebook, Seventh Edition, Section VI.C.1
      1. It should only refer to ....Section VI.C.1.c
3. File Name: CEC RPS eTag (APU Comments)
  - a. Please see Anaheim notes in tab “Notes for Anaheim Comments”

# City of Anaheim Detailed Comments on CEC Reporting Templates

## Appendix B

**File Name: POU\_RPS Compliance  
Spreadsheet (APU Comments)**

8/16/2013

California Energy Commission  
 Dockets Office, MS-4  
 RE: Docket No. 13-RPS-01  
 RPS Proceeding  
 1516 Ninth Street  
 Sacramento, CA 95814-5512

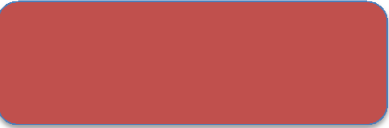


Via Email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

RE: The City of Anaheim Comments to the California Energy Commission's Renewable Portfolio Standard (RPS) Implementation for Local Publicly Owned Electric Utilities (POU's) in response to the July 29, 2013 Workshop

The City of Anaheim is pleased to submit comments on the templates and forms for RPS Compliance. The tabs in this Spreadsheet include Anaheim comments. Below are notes on how Anaheim comments are organized.

Anaheim is pleased to provide comments on the following tabs, for the file POU\_RPSComplianceSpreadsheet (APU Comments):

1. Title Page
2. Instructions
- 3 Static Contract Info HC10 PCC 0
4. Static Contract Info PCC 1
5. Static Contract Info PCC 2 Ren
6. Static Contract Info PCC 3
7. Annual Report Accounting
8. Summary 2011
9. Summary 2012
10. Summary 2013
11. Compliance Period Accounting
12. Compliance Period Summary
13. Attestation

KEY	NOTES	ICON
Items in Red Text Box	Data is already presented in other CEC Reports. A centralized database with all of the CEC reporting efforts is recommended, to prevent duplication of reporting data.	
Items in Blue Text Box	Data is not linked and linking is recommended, to streamline the reporting process.	
Items in Green Text Box	Clarification on data requirements or formatting questions.	



## (To be completed by Publicly Owned Utilities) COMPLIANCE REPORT to the CALIFORNIA ENERGY COMMISSION ON THE RENEWABLES PORTFOLIO STANDARD PROGRAM

Please enter the name of the Publicly Owned Utility submitting this report, the  
Form Completion Date, and the Reporting Year(s) Covered

Utility Name	
Form Completion Date	
Calendar Year(s) Covered in Report	

### Reporting for the Renewables Portfolio Standard Program, by tab:

Static - Contract Information: For reports submitted in 2013, complete with information from contracts and ownership agreements executed on or before December 31, 2012. For reports submitted in 2014 and after, complete with information from contracts and ownership agreements executed in the previous calendar year.

Annual Report Accounting: Complete and update annually for previous and forecasted years.

Summary 2011: Complete in 2013 with aggregated fuel type information from 2011.

Summary 2012: Complete in 2013 with aggregated fuel type information from 2012.

Summary 2013: Complete in 2014 with aggregated fuel type information from 2013.

Compliance Period Accounting: Complete at the end of each compliance period.

Compliance Period Summary: Complete at the end of each compliance period.

Energy Commission staff may request additional information from publicly owned utilities to verify the generation and RPS procurement claims of electricity products reported in this form. If requested, an authorized officer or agent of the publicly owned utility must submit additional information. E-mail the completed file to the address shown below. Then print out the file, sign the attestation as appropriate, and mail the package to the address shown below:

**California Energy Commission**  
**e-mail: [RPSTrack@energy.ca.gov](mailto:RPSTrack@energy.ca.gov)**

#### **Renewable Energy Program**

Attn: Interim Tracking  
California Energy Commission  
1516 9th Street, MS-45  
Sacramento, CA 95814-5555

It would be helpful if the deadlines  
were provided here

This report is due on July 1st of each year. For 2011 and 2012 data, follow the reporting instructions due dates in the Energy Commission's RPS Eligibility Guidebook, Seventh Edition and specified in the regulations for Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities as adopted by the Energy Commission.

## Static Contract Information Tabs

**Static contract information tab instructions** - Please list all executed renewable energy contracts or ownership agreements, and enter applicable corresponding facility information. For Historic Carryover and Count in Full contract information, please use the Static Contract Info PCC 0 tab. If the contract or ownership agreement is amended, update any information that has changed, and make a note of the changes and the amendment execution date in the Notes column. The information reported on this spreadsheet should be classified by expected portfolio content category. If you expect multiple categories of electricity products from a single contract or ownership agreement, please enter information for that contract/agreement under each expected category. Actual portfolio content category classification for electricity products will be verified by the Energy Commission after it has been reported using the Interim Tracking System and/or WREGIS Compliance Reports. If you need additional rows, highlight the bottom row for the appropriate category, right-click and select "Insert."

1	Reporting Year	<p>Enter the year in which the REC is being retired and used for RPS compliance. The reporting year is not the year in which the REC was purchased from one facility, indicate the name of the facility. If electricity products will be purchased from a portfolio of assets, list all the facilities included in the asset. If the facilities included in the asset are unknown, indicate unknown.</p> <p>#1 This is different from the AB 162 Report. For PCC 3 RECS, we report them in AB 162 when they were contracted, but for compliance we report the year that they are being retired for. For example, entities can execute contracts in 2013, but for 2011 PCC 3 RECS.</p> <p>Facility Name as listed on the CEC RPS List? Provide Reference or a drop down</p>	<p>Please update the year to a calendar year preceding the July 1 reporting due date.</p>
2	Facility Name	<p>If electricity products will be purchased from one facility, indicate the name of the facility. If electricity products will be purchased from a portfolio of assets, list all the facilities included in the asset. If the facilities included in the asset are unknown, indicate unknown.</p>	
3	Primary/ Secondary Fuel Type	<p>Select the primary fuel used from the drop-down options. If other, please specify. For multi-fuel facilities, also select from the secondary fuel type column.</p>	
4	Owner/Seller	<p>Indicate the wholesale seller of electricity products. If utility owned, state "utility owned." If purchased from a load-serving entity, state the name of the load-serving entity.</p>	
5	Location (County and State, or Country if outside US)	<p>Indicate the county and state that the facility is located in. If the facility is located outside of the United States, please indicate the country in which the facility is located. If incremental electricity is provided from system power purchases indicate "system power purchases."</p>	
6	Facility Status	<p>Select status of the project from drop-down options. As of 2013, "New, Planned" refers to any new planned project that is expected to come online on or after January 1, 2005. "New, Under Construction" refers to any new project that has begun construction and expected to come online on or after January 1, 2005. "New, Online" refers to any new project that came online on or after January 1, 2005. "Repowered, Planned" refers to the planned replacement of prime generating equipment equaling at least 80% of the total value of the project (see <i>RPS Eligibility Guidebook</i> for further information). "Repowered, Under Construction" refers to the planned replacement of prime generating equipment equaling at least 80% of the total value of the project (see <i>RPS Eligibility Guidebook</i> for further information). "Repowered, Online" refers to the replacement of prime generating equipment equaling at least 80% of the total value of the project (see <i>RPS Eligibility Guidebook</i> for further information).</p> <p>#7,9, 10, 11, 12, 13 Set a format for the date(1/1/2009, January 1, 2009, January 2009, etc.). Provide format for all instances where there is a date required. In the CEC-RPS_Hourly Template, CEC provides guidance on the format of the data, stating "(for example, 01/01/2011; 01/02/2011, and so forth)" this needs to be included here and the cells need to be formatted</p>	
7	Contract Execution Date (Must be before June 1, 2010)	<p>Indicate the date the contract or ownership agreement was originally executed or when ownership began. Provide supporting documentation such as a copy of the contract agreement demonstrating the contract execution date with confidential information redacted.</p>	

8	If the Contract Execution Date is Before January 1, 2005, Does the Contract Contain Explicit Terms and Conditions Specifying the Ownership or Disposition of the RECs?	Public Utilities Code Section 399.21, Subdivision (a)(4) states that RECs may not be created for electricity generated pursuant to any electricity purchase contract with a retail seller or POU executed before January 1, 2005, unless the contract contains explicit terms and conditions specifying the ownership or disposition of those RECs. The law requires procurement under those contracts to be tracked through WREGIS and counted toward the RPS procurement requirement of the retail seller or POU purchasing the electricity. Energy Commission staff must track facilities falling under this requirement to ensure that the RECs are not traded and/or claimed by other reporting entities. If there is a contract execution date before January 1, 2005, choose yes or no to indicate if the contract contains explicit terms and conditions specifying the ownership or dispositions on the RECs. For a contract that does not contain explicit terms and conditions specifying the ownership or dispositions on the RECs, an automatic WREGIS retirement subaccount may be utilized to retire WREGIS certificates. Automatic retirement subaccounts are not a requirement, but it is required that these WREGIS certificates be used for the RPS by the contracting POU.
9	Contract Start Date	Indicate the first date that electricity products were or will be procured by the buyer.
10	Facility Eligibility Date	Indicate the RPS-eligibility date for the facility, as indicated on the RPS eligibility certificate distributed by the Energy Commission. If this is yet to be determined, indicate TBD. The eligibility date, or beginning on date, is the date upon which the Energy Commission deems the first application for a facility received. Generation is typically eligible back to the month containing this beginning on date, see Section IV B 3: Eligibility Date in the RPS Guidebook for additional information.
11	Facility Online Date	Enter the commercial online date for the facility.
12	Renewable Technology On-line Date	Enter the date when the facility came online using a renewable fuel or technology, if different than the commercial online date.
13	Contract End Date	Standard #14: What if a term is less than a year, do we provide text (3 months, 4 years, 48 months, etc.). Anaheim recommends a consistent format for this data so it is easier to transfer into a
14	Contract Term	Indicate the duration of the contract. If the facility is utility owned, state "utility owned."
15	Type of Ownership or Contract Arrangement	<ul style="list-style-type: none"> <li>Receive facility's full output</li> <li>Receive facilities full output during contracted timeframe</li> <li>Receive percent share of facility's output during contracted timeframe</li> <li>Receive a fixed amount during contracted timeframe</li> <li>Incremental generation - full RPS eligible amount</li> <li>Incremental generation - percent share of RPS eligible amount</li> <li>Other</li> </ul> Provide comments, as needed, to explain contracting, ownership or other facility arrangements.
16	Contract Amount of Annual Total Generation Procured	<p>For each reporting year, enter the annual amount of total generation procured under the current contract/agreement (MWh, rounded to the nearest ten-thousandth -- for example, 8.1234 MWh). If fixed amount, enter total contractual fixed amount (annually if applicable) and provide additional explanations in the notes section as necessary. Explain in "Notes" section if volume or percent amount changes annually and provide annual specific amounts per calendar year or total amount contracted for over multiple years -- list out the years. If the amount is a percent share of the output, indicate the percent share and explain in detail in the notes section.</p> <p>If contract arrangement is for multiple facilities, group all of the facilities covered under one contract together on the reporting form and indicate in the notes section associated with each facility that it is covered in the one overarching contract (use the same contract name or contract ID for the facilities listed so that staff may identify all facilities in covered in one contract). List the contract amount in the notes section if the contract amount is not specified to an individual facility. Provide supporting documentation such as a copy of the contract agreement demonstrating the share (%) or fixed contract amount with confidential information redacted</p>
17	EIA ID	Energy Commission staff compares RPS procurement claims with generation data obtained from the various sources, including the United States Energy Information Association (EIA). Please provide the EIA number associated with the facility, if known.
18	Contract Termination Date	If the contract is terminated before the contract end date, please enter the termination date. Provide supporting documentation with confidential information redacted.

19	Notes	Include any additional information about the contract, including information on any amendments to the contract. If a contract has been submitted to RPS Energy Commission staff, indicate that the contract has already been submitted. You are not required to submit the contract again. Indicate if certification is pending. Provide other helpful notes as deemed appropriate.																
20	For Historic Carryover Is the facility currently RPS Certified (Y/N)	Indicate whether the facility is currently RPS certified under any edition of the RPS guidebook. If an application for certification has been submitted, but not yet approved indicate Pending.																
21	For Historic Carryover Under what RPS Guidebook was the Contract Signed?	<p>Indicate the adoption date of the RPS guidebook edition the PPA or ownership agreement was signed for this facility.</p> <table border="0"> <tr> <td>Guidebook adoption Date</td> <td>For contracts signed before</td> </tr> <tr> <td>March 19, 2004</td> <td>August 11, 2004</td> </tr> <tr> <td>August 11, 2004</td> <td>May 21, 2005</td> </tr> <tr> <td>May 21, 2005</td> <td>April 26, 2006</td> </tr> <tr> <td>April 26, 2006</td> <td>March 14, 2007</td> </tr> <tr> <td>March 14, 2007</td> <td>December 19, 2007</td> </tr> <tr> <td>December 19, 2007</td> <td>December 15, 2010</td> </tr> <tr> <td>December 15, 2010</td> <td>January 1, 2011</td> </tr> </table>	Guidebook adoption Date	For contracts signed before	March 19, 2004	August 11, 2004	August 11, 2004	May 21, 2005	May 21, 2005	April 26, 2006	April 26, 2006	March 14, 2007	March 14, 2007	December 19, 2007	December 19, 2007	December 15, 2010	December 15, 2010	January 1, 2011
Guidebook adoption Date	For contracts signed before																	
March 19, 2004	August 11, 2004																	
August 11, 2004	May 21, 2005																	
May 21, 2005	April 26, 2006																	
April 26, 2006	March 14, 2007																	
March 14, 2007	December 19, 2007																	
December 19, 2007	December 15, 2010																	
December 15, 2010	January 1, 2011																	
22	For Historic Carryover, does the facility meet the eligibility requirements under the edition of the guidebook indicated, provide supporting documentation as necessary?	<p>The POU is required to prove that the facility indicated is eligible under the edition of the RPS guidebook in place at the time the PPA or ownership agreement was signed. Evidence of compliance may include:</p> <ol style="list-style-type: none"> <li>1. A previously awarded certification under the guidebook in place when the PPA or ownership agreement was signed. The RPS ID for the facility will suffice.</li> <li>2. A current certification under a different guidebook with all supplemental information required by the edition in place when the PPA or ownership agreement was signed. Requires the RPS ID for the facility and the supplemental information required by the edition in place when the PPA or ownership agreement was signed.</li> <li>3. For facilities not currently RPS certified and that have not applied for certification, an unsigned CEC-RPS-1 form under the current RPS guidebook with the necessary supporting documentation required by the edition in place when the PPA or ownership agreement was signed.</li> </ol>																
23	PCC 1 Initial Qualification	<p>Indicate one of the following and provide supporting documentation with confidential information redacted. Energy Commission is working to obtain interconnection information for RPS-Certified facilities, but in the case this information is not available, POUs must provide it when making PCC 1 claims. "Interconnected to CBA" refers to a facility that has its first point of interconnection within the metered boundaries of a California Balancing Authority (CBA) Area. "Interconnected to Distribution System" refers to a facility that has its first point of interconnection to an electricity distribution system used to serve end users within the metered boundaries of a California Balancing Authority Area. "Scheduled into CBA" refers to electricity products from a facility that is not directly connected to a CBA and that has generation scheduled on an hourly or subhourly basis into a CBA without substituting electricity from another source. "Dynamic Transfer into CBA" refers to electricity products subject to an agreement between a CBA and the Balancing Authority in which the facility is located to dynamically transfer electricity from the facility into the CBA Area.</p>																
24	For Facilities NOT directly connected to a CBA, Facility Source Name - as registered with webRegistry	Enter the facility's source name, as registered with OATI's webRegistry. This applies mainly to facilities not directly connected to a CBA.																
25	Scheduling Coordinator	As detailed within the scheduling agreement or procurement contract. If more than one party is designated as a schedule coordinator, please list the primary scheduling coordinator first and add additional scheduling coordinators separated by a comma.																
26	Resale Agreement	Choose yes or no to indicate if contract is a resale agreement. Provide supporting documentation with confidential information redacted.																

27	Incremental to POU	For PCC 2 Incremental only - contract/agreement execution date on or after contract date for the associated renewable energy. Choose yes or no to indicate whether the contract for substitute energy was executed on or after the contract/agreement execution date for the associated renewable energy. Provide supporting documentation with confidential information redacted.
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## Annual Report Accounting Tab

**Instructions** - The Annual Report Accounting tab should be completed every year to show the actual retail sales and RPS procurement retired for the reporting year(s). Forecasted data should be replaced with actual data as necessary, and forecasts may be updated to reflect new information. When forecasted data is replaced with actual data, please ensure that the column heading colors are updated to reflect the changes. Cells in grey are static information and do not require POU input. Cells in white will automatically populate and also do not require POU input. Cells under dark blue column headers contain forecasted data.

## Annual Summary Tabs

**Instructions** - Enter MWh of all RPS-eligible procurement, including unbundled RECs, by fuel type. Cells in white and grey will automatically populate and do not require POU input.

## Compliance Period Accounting Tab

**Instructions** - The Compliance Period Accounting tab should be completed at the end of each compliance period to show historic carryover and excess procurement applied toward the RPS procurement requirements for the compliance period, as well as excess procurement accumulated during the compliance period. POU must also indicate how many MWh in each category will be applied toward the RPS procurement target for the compliance period. Cells in grey are static information and do not require POU input. Cells in white will automatically populate and also do not require POU input.

Compliance Period Accounting Tab Footnotes		
1	Historic Carry-over Applied	Enter the number of MWh, rounded to the nearest ten-thousandth (for example, 8.1234 MWh), of verified historic carryover to be applied toward RPS procurement requirements for the compliance period.
2	Excess Procurement from Previous Compliance Periods Applied	Enter the number of MWh, rounded to the nearest ten-thousandth (for example, 8.1234 MWh), of verified excess procurement from previous compliance periods to be applied toward RPS procurement requirements for the compliance period.
3	Target	Enter the number of MWh, rounded to the nearest ten-thousandth (for example, 8.1234 MWh), from each listed category to be applied to the RPS procurement target, for the purposes of calculating the portfolio balance requirements and excess procurement.
4	Total Historic Carry-Over	Enter the total number of MWh, rounded to the nearest ten-thousandth (for example, 8.1234 MWh), of historic carryover verified by the Energy Commission.

## Compliance Period Summary Tab

**Instructions** - The Compliance Period Summary tab should be completed at the end of each compliance period to show historic carryover and excess procurement applied toward the RPS procurement requirements for the compliance period, as well as excess procurement accumulated during the compliance period. Cells in white and grey will automatically populate and do not require POU input.

## List of Narratives to be Attached

**Instructions** - Indicate as Yes or No if the listed narrative will be included with the CEC-RPS-POU Compliance Report.

[illegible]

CEC-POU-RPS



[illegible]



[illegible]

CEC-POU-RPS

[illegible]

CEC-POL-RP6 Static Contract into PCC-3 POL\_RPSComplianceSpreadsheet (APU Comments) April 2013

## Annual RPS Compliance Report:Accounting

	Input Required
	Actual Data
	Forecasted Data

Why is forecasted data being requested? Is this to show reasonable progress? Anaheim's Procurement Plan also provides this data and we submit the Procurement Plan to the CEC, annually.

	Compliance Period 1			Compliance Period 2			Compliance Period 3			
	Actual			Forecasted						
Annual RPS Procurement and Percentages (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Annual Retail Sales										
Annual RPS Procurement Retired	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Soft Targets	20.00%	20.00%	20.00%	20.00%	20.00%	25.00%	27.00%	29.00%	31.00%	33.00%
Annual RPS Procurement Percentage	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

	Compliance Period 1			Compliance Period 2			Compliance Period 3			
Procurement Target (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Procurement Target		0.0000			0.0000			0.0000		
Category 0 RECs Retired										
Category 1 RECs Retired										
Pre-June 1, 2010 Category 1 RECs Retired										
Category 2 RECs Retired										
Pre-June 1, 2010 Category 2 RECs Retired										
Category 3 RECs Retired										
Pre-June 1, 2010 Category 3 RECs Retired										
Soft Targets	20.00%	20.00%	20.00%	20.00%	20.00%	25.00%	27.00%	29.00%	31.00%	33.00%
RECs Retired as Percentage of Retail Sales	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!
Forecasted Total RECs Retired (Compliance Period)		0.0000			0.0000			0.0000		

This data should be linked to the tabs, corresponding to PCC category and summed up based on year.



## RPS Compliance Report: Summary

Input Required

	<b>2011</b>
Report Date	

<b>RPS Summary Report</b>	<b>MWh</b>	<b>%</b>
Current Year Total Retail Sales	0.0000	
<b>Total RECs Retired</b>	0.0000	#DIV/0!
<b>Total RPS Eligible Procurement</b>	0.0000	#DIV/0!

<b>RECs Retired by Portfolio Content Category</b>	<b>MWh</b>	<b>%</b>
RECs Retired from Contracts Executed Prior to June 1, 2010	0.0000	#DIV/0!
RECs Retired from Category 1 Eligible Resources	0.0000	#DIV/0!
RECs Retired from Category 2 Eligible Resources	0.0000	#DIV/0!
RECs Retired from Category 3 Eligible Resources	0.0000	#DIV/0!
<b>Total RECs Retired to meet Target in 2011</b>	<b>0.0000</b>	

<b>RPS Eligible Procurement</b>	<b>MWh</b>	<b>%</b>
Biomass	This data should be linked to the tabs, corresponding to PCC category and summed up based on year.	#DIV/0!
Digester Gas		#DIV/0!
Biodiesel		#DIV/0!
Landfill Gas		#DIV/0!
Muni Solid Waste		#DIV/0!
<i>Biopower Subtotal</i>		#DIV/0!
Geothermal		#DIV/0!
Small Hydro		#DIV/0!
Conduit Hydro		#DIV/0!
Solar PV		#DIV/0!
Solar Thermal		#DIV/0!
Wind		#DIV/0!
Ocean/Tidal		#DIV/0!
Fuel Cells		#DIV/0!
<b>Total RPS Eligible Procurement</b>	<b>0.0000</b>	





## RPS Compliance Report: Summary

Input Required

	<b>2012</b>
Report Date	

<b>RPS Summary Report</b>	<b>MWh</b>	<b>%</b>
Current Year Total Retail Sales	0.0000	
<b>Total RECs Retired</b>	0.0000	#DIV/0!
<b>Total RPS Eligible Procurement</b>	0.0000	#DIV/0!

<b>RECs Retired by Portfolio Content Category</b>	<b>MWh</b>	<b>%</b>
RECs Retired from Contracts Executed Prior to June 1, 2010	0.0000	#DIV/0!
RECs Retired from Category 1 Eligible Resources	0.0000	#DIV/0!
RECs Retired from Category 2 Eligible Resources	0.0000	#DIV/0!
RECs Retired from Category 3 Eligible Resources	0.0000	#DIV/0!
<b>Total RECs Retired to meet Target in 2011</b>	<b>0.0000</b>	

<b>RPS Eligible Procurement</b>	<b>MWh</b>	<b>%</b>
Biomass	This data should be linked to the tabs, corresponding to PCC category and summed up based on year.	#DIV/0!
Digester Gas		#DIV/0!
Biodiesel		#DIV/0!
Landfill Gas		#DIV/0!
Muni Solid Waste		#DIV/0!
<i>Biopower Subtotal</i>		#DIV/0!
Geothermal		#DIV/0!
Small Hydro		#DIV/0!
Conduit Hydro		#DIV/0!
Solar PV		#DIV/0!
Solar Thermal		#DIV/0!
Wind		#DIV/0!
Ocean/Tidal		#DIV/0!
Fuel Cells		#DIV/0!
<b>Total RPS Eligible Procurement</b>	<b>0.0000</b>	



## RPS Compliance Report: Summary

 Input Required

	<b>2013</b>
Report Date	

<b>RPS Summary Report</b>	<b>MWh</b>	<b>%</b>
Current Year Total Retail Sales	0.0000	
<b>Total RECs Retired</b>	0.0000	#DIV/0!
<b>Total RPS Eligible Procurement</b>	0.0000	#DIV/0!

<b>RECs Retired by Portfolio Content Category</b>	<b>MWh</b>	<b>%</b>
RECs Retired from Contracts Executed Prior to June 1, 2010	0.0000	#DIV/0!
RECs Retired from Category 1 Eligible Resources	0.0000	#DIV/0!
RECs Retired from Category 2 Eligible Resources	0.0000	#DIV/0!
RECs Retired from Category 3 Eligible Resources	0.0000	#DIV/0!
<b>Total RECs Retired to meet Target in 2011</b>	<b>0.0000</b>	

<b>RPS Eligible Procurement</b>	<b>MWh</b>	<b>%</b>
Biomass	This data should be linked to the tabs, corresponding to PCC category and summed up based on year.	#DIV/0!
Digester Gas		#DIV/0!
Biodiesel		#DIV/0!
Landfill Gas		#DIV/0!
Muni Solid Waste		#DIV/0!
<i>Biopower Subtotal</i>		#DIV/0!
Geothermal		#DIV/0!
Small Hydro		#DIV/0!
Conduit Hydro		#DIV/0!
Solar PV		#DIV/0!
Solar Thermal		#DIV/0!
Wind		#DIV/0!
Ocean/Tidal		#DIV/0!
Fuel Cells		#DIV/0!
<b>Total RPS Eligible Procurement</b>	<b>0.0000</b>	

## RPS Compliance Period Report

	Input Required
	Actual Data
	Forecasted Data

	Compliance Period 1			Compliance Period 2			Compliance Period 3			
	Actual			Forecast						
Annual RPS Procurement and Percentages (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Annual Retail Sales	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Annual RPS Procurement Retired	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Soft Targets	20.00%	20.00%	20.00%	20.00%	20.00%	25.00%	27.00%	29.00%	31.00%	33.00%
Annual RPS Procurement Percentage	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total RECs Procured (Compliance Period)	0.0000			0.0000			0.0000			
	Compliance Period 1			Compliance Period 2			Compliance Period 3			
Procurement Target (MWh)	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Procurement Target	0.0000			0.0000			0.0000			
Category 0 RECs Retired	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Category 1 RECs Retired	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Pre-June 1, 2010 Category 1 RECs Retired	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Category 2 RECs Retired	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Pre-June 1, 2010 Category 2 RECs Retired	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Category 3 RECs Retired	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Pre-June 1, 2010 Category 3 RECs Retired	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Sum	0.0000			0.0000			0.0000			
Historic Carryover Applied <sup>1</sup>				This data should be linked to the tabs, corresponding to PCC category (tab "Static Contract HC10_PCC0) Info and summed up based on year.						
Excess Procurement from Previous Compliance Periods Applied <sup>2</sup>	0.0000									
Total RECs Retired (Compliance Period)	0.0000			0.0000			0.0000			
Soft Targets	20.00%	20.00%	20.00%	20.00%	20.00%	25.00%	27.00%	29.00%	31.00%	33.00%
RECs Retired as Percentage of Retail Sales	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

	Compliance Period 1		
Portfolio Balance Requirements (MWh)	Total Retired	Target <sup>3</sup>	Excess
Category 0 RECs Retired	0.0000		0.0000
Historic Carryover applied	0.0000		0.0000
Category 1 RECs Retired	0.0000		0.0000
Pre-June 1, 2010 Category 1 RECs Retired	0.0000		0.0000
Category 2 RECs Retired	0.0000		0.0000
Pre-June 1, 2010 Category 2 RECs Retired	0.0000		0.0000
Category 3 RECs Retired	0.0000		n/a
Pre-June 1, 2010 Category 3 RECs Retired	0.0000		n/a
Total RECs applied to the Target*	0.0000		
Total RECs applied to the PBR	0.0000		
Category 1 Balance Requirement	0.0000		
Category 3 Balance Limitation	0.0000		
Disallowed Category 3 RECs	0.0000		

	Compliance Period 1
Excess Procurement Calculation (MWh)	
Total RECS retired	0.0000
Procurement Target	0.0000
Potential Excess	0.0000
Short-Term RECs	
Excess RECs Eligible	0.0000
Excess Category 0 RECs	
Excess Category 1 RECs	
Excess Pre-June 1, 2010 Category 1 RECs	
Excess Category 2 RECs	
Excess Pre-June 1, 2010 Category 2 RECs	

\*The sum of the total RECs applied to the Target will be flagged if they exceed the Procurement Target (line 20)

Additional Procurement	Starting Balance	Applied to Current Compliance Period	Accumulated in Current Compliance Period	Remaining Balance
<b>Total Excess Procurement</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>
Excess Category 0 RECs	0.0000	0.0000	0.0000	0.0000
Excess Category 1 RECs	0.0000	0.0000	0.0000	0.0000
Excess Pre-June 1, 2010 Category 1 RECs	0.0000	0.0000	0.0000	0.0000
Excess Category 2 RECs	0.0000	0.0000	0.0000	0.0000
Excess Pre-June 1, 2010 Category 2 RECs	0.0000	0.0000	0.0000	0.0000
Total Historic Carryover <sup>a</sup>		0.0000	n/a	0.0000

	Compliance Period 1		
RPS Procurement Enforcement (MWh)	2011	2012	2013
Deficit of RECs Necessary to Meet Target		0.0000	
Deficit of RECs Necessary to Meet Portfolio Balance Requirements		0.0000	

Optional Compliance Measures Applied	Yes/No
Cost Limitations	
Delay of Timely Compliance	
Reduction of PCC 1	

**RPS Compliance Report: Summary**

Input Required

2011-13 Compliance Period	
Report Date	

RPS Summary Report	MWh	%
Total Retail Sales	0.0000	
Procurement Target	0.0000	#DIV/0!
<b>Total RECs Retired to meet Compliance Period Target</b>	<b>0.0000</b>	<b>#DIV/0!</b>
<b>Total RPS Eligible Procurement</b>	<b>0.0000</b>	<b>#DIV/0!</b>

RECs Retired by Portfolio Content Category	MWh	%
RECs Retired from Contracts Executed Prior to June 1, 2010	0.0000	#DIV/0!
RECs Retired from Category 1 Eligible Resources	0.0000	#DIV/0!
RECs Retired from Category 2 Eligible Resources	0.0000	#DIV/0!
RECs Retired from Category 3 Eligible Resources	0.0000	#DIV/0!
Historic Carryover Applied	0.0000	#DIV/0!
<b>Total RECs Retired to meet Compliance Period Target</b>	<b>0.0000</b>	
Did POU Meet the Target?		

This should be a conditional formatted cell

RPS Eligible Procurement	MWh	%
Biomass	0.0000	#DIV/0!
Digester Gas	0.0000	#DIV/0!
Biodiesel	0.0000	#DIV/0!
Landfill Gas	0.0000	#DIV/0!
Muni Solid Waste	0.0000	#DIV/0!
Biopower Subtotal	0.0000	#DIV/0!
Geothermal	0.0000	#DIV/0!
Small Hydro	0.0000	#DIV/0!
Conduit Hydro	0.0000	#DIV/0!
Solar PV	0.0000	#DIV/0!
Solar Thermal	0.0000	#DIV/0!
Wind	0.0000	#DIV/0!
Ocean/Tidal	0.0000	#DIV/0!
Fuel Cells	0.0000	#DIV/0!
<b>Total RPS Eligible Procurement</b>	<b>0.0000</b>	



**(TO BE COMPLETED BY LOCAL PUBLICLY OWNED ELECTRIC UTILITIES)  
COMPLIANCE REPORT to the CALIFORNIA ENERGY COMMISSION  
ON THE RENEWABLES PORTFOLIO STANDARD PROGRAM  
ATTESTATION FORM**

I am an authorized officer or agent of the publicly owned utility, as noted below, and hereby submit this report and attest to the following on behalf of said entity:

- 1) I am an authorized officer or agent of the publicly owned utility, as noted below and for which this report was prepared, and have authority to submit this report on behalf of said entity;
- 2) The information and data provided in this report are submitted to the California Energy Commission for use in verifying the publicly owned utility's procurement claims of electricity products from the RPS-certified electrical generation facilities as identified in this report for purposes of the RPS and in accordance with the Energy Commission's *Renewables Portfolio Standard Eligibility Guidebook*;
- 3) To the best of my knowledge, none of the electricity generation identified in this report, nor any of the RPS-certified electrical generation facilities, as defined in the *Renewables Portfolio Standard Eligibility Guidebook*, associated with the such claims, have been or will be used more than once to satisfy RPS procurement requirements or verification purposes;
- 4) I have read the *Renewables Portfolio Standard Eligibility Guidebook* and understand the provisions, requirements of that guidebook and my responsibilities under the guidebook, including my responsibilities to provide additional information for RPS verification purposes if requested by the Energy Commission; and
- 5) I declare under penalty of perjury that the information and data provided in this report is true and correct to the best of my knowledge.

Anaheim supports the statement "best of my knowledge."

Signed: \_\_\_\_\_ Dated: \_\_\_\_\_

Name of Officer or Agent: \_\_\_\_\_

Title of Officer or Agent: \_\_\_\_\_

Authorized Officer or Agent of Publicly Owned Utility	
Name:	_____
Title:	_____
Phone:	_____
E-mail:	_____
Fax:	_____
Publicly Owned Utility	
Entity Name:	_____
Street Address:	_____
City, State, Zip Code	_____
Year POU Established	_____
No. of CA End-Use Retail Customer Accts.	_____

# City of Anaheim Detailed Comments on CEC Reporting Templates

## Appendix B

**File Name: CEC-RPS\_Hourly (APU  
Comments)**



**(TO BE COMPLETED BY POU<sub>s</sub>)**  
**REPORT to the CALIFORNIA ENERGY COMMISSION**  
**Report of Scheduled into a CBA - PCC 1 Claims**  
**Annual Hourly Comparison Spreadsheet for POU RPS Claims**

## GENERAL INSTRUCTIONS

Please enter the name of the publicly owned utility represented on this form and the calendar year covered by this report, the name, RPS ID, and WREGIS ID numbers of the RPS-certified electrical generation facility for which the data applies. The Sum of Eligible PCC 1 volume will be calculated and pulled automatically from Schedule 4. For purposes of this form, the term "facility" means the RPS-certified electrical generation facility.

Company Name	
Calendar Year	
RPS-Certified Facility Name	
RPS ID Number	
WREGIS ID Number	
Sum of Eligible PCC 1	0

This form may be used by publicly owned utilities to report hourly generator meter data and hourly final e-Tag schedule data as specified in the Renewables Portfolio Standard Eligibility Guidebook, Seventh Edition, Section VI. C. 1. Portfolio Content Category 1. Because of the amount of data required for this analysis, one form per RPS-certified facility that is NOT directly connected to a CBA is required. If there are multiple e-Tags per hour, insert rows as necessary to list all e-Tags associated with each hour. If you have a fixed volume contract, use the provided "Fixed Amount Calculation" tab. The Fixed Amount Calculation tab calculates the percent share of the meter output using the fixed volume amount in the final column which must be copied into the "Percent Share of Facility Output" column of Schedule 4 manually. Fill out Schedule 4 with all relevant hourly meter and final e-Tag schedule information.

E-mail the completed file to the address shown below. Then print out the file, sign the attestation, and mail the package to the address shown below:

**California Energy Commission**  
**e-mail: [RPSTrack@energy.ca.gov](mailto:RPSTrack@energy.ca.gov)**

Renewable Energy Program  
Attn: Interim Tracking  
California Energy Commission  
1516 9th Street, MS-45  
Sacramento, CA 95814-5512

Responses to this request only to apply when claims are made from RPS-certified facilities that are NOT directly connected to a CBA and for which the POU is making a PCC 1 claim.

This report is due on July 1st of each year. For 2011 and 2012 data, follow the reporting instructions due dates in the Energy Commission's RPS Eligibility Guidebook, Seventh Edition and specified in the regulations for Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities, as adopted by the Energy Commission.



**(TO BE COMPLETED BY POU's)**  
**REPORT to the CALIFORNIA ENERGY COMMISSION**  
**Report of Schedule**  
**Annual Hourly Comparison**

Anaheim recommends that this section be re-stated to say "...Section VI.C.1.c." This section only refers to PCC 1 with a first point of interconnection outside a CBA. This does not apply to all of Section VI.C.1. NERC e-tag information is not required for PCC 1 resources directly interconnected to a

**Schedule 4 - Annually Hourly Comparison**

**INSTRUCTIONS:** Enter all necessary and complete generator meter data and annual hourly final e-Tag schedule data as specified in the Renewables Portfolio Standard Eligibility Guidebook, Seventh Edition, Section VI. C. 1. Portfolio Content Category 1. When completing this form, use one row to report generator meter and final e-Tag schedule data for each hour and for each e-Tag. This form is to be used to report data from one facility and for no more than one year.

**FOOTNOTES**

1	Date	Enter the date of the generation. (for example, 01/01/2011; 01/02/2011, and so forth)
2	Hour Ending	Enter the hour ending for each hour. (1; 2; 3 and so forth)
3	E-Tag ID Number	Enter the e-Tag Identification number (e-Tag Code) for the e-Tag representing the final schedule. If there are multiple e-Tags in an hour include each e-Tag on its own row. Staff will match the e-Tag ID Number with the WREGIS Compliance Report and/or the RPS Track claims, where the e-Tag ID Number should be listed.
4	Hourly Final Schedule (MWh)	Enter the hourly volume on the e-Tag showing the final schedule that was provided in the previous field, in MWh. Include four decimal points to show kWh.
5	Hourly Meter Data (MWh)	Enter the RPS-certified facility's meter data for this hour. This is the full output from the facility, reported in MWh. Include four decimal points to show kWh. There should only be one MWh amount per hour, so if there are multiple e-Tags, the hourly meter data should be the same for that same hour of generation.
6	Percent Share of Final Schedule (%)	Enter the procuring entity's percent share of the schedule represented on the e-Tag. If this is 100%, enter 100%.



7	Percent Share of Facility Generation Output (%)	Enter the procuring entity's percent share of the facility's output. If this is 100%, enter 100%. When reporting data from fixed volume contracts, use the values calculated in the "Fixed Amount Calculation" sheet (Column E) as the "Percent Share of Facility Output." Use the same value for each e-Tag within each hour. For any contracting or power purchase agreement situations not captured in this spreadsheet, the percent share amount may need to be calculated outside of the spreadsheet. Contact staff if you need to make calculations outside of this summary spreadsheet or if it may facilitate reporting to combine multiple reporting entities onto one reporting form (although any such combined reporting will still require individual attestations from each POU).
8	Eligible PCC 1 Volume (MWh)	This field is automatically calculated as the lesser of (Final Schedule*Percent Share of Final Schedule) and (Hourly Meter Data*Percent Share of Facility Output). Given the restrictions of matching within the WREGIS system an entity can only match a whole MWh of an e-Tag schedule with the same amount of WREGIS certificates. To avoid stranding kWh of scheduled generation, the reported MWh quantities in the lesser of analysis includes four decimal points. The maximum amount of PCC 1 for a year that may be matched with e-Tags is the sum of this column. The sum of this column is calculated and displayed on the front page of this report. Amounts matched must include only actual generation amounts that were scheduled into a CBA as demonstrated on the final e-Tag schedule.
9	Contract or Power Purchase ID	Enter the contract, power purchase or ownership agreement identification (ID) - name or number for the contract or official agreement under which the power was purchased.

### Fixed Amount Calculation Spreadsheet

**INSTRUCTIONS:** This spreadsheet is to be used by utilities who are contracted for specific fixed amounts of electricity from a facility in each hour to calculate their percent share of the electrical generation facility's output. Enter all necessary annual hourly generator meter data and annual hourly fixed amounts. Only include data for one facility and one year on each report. Only one row per hour. Do not enter multiple rows per e-tag on this spreadsheet. After the data is entered, the spreadsheet calculates the percent share of facility output. Copy these results from the "Percent Share of Facility Generation Output" column and paste them into the "Percent Share of Facility Generation Output" column in Schedule 4. Be careful to match the data for each hour on this spreadsheet to the same hour on Schedule 4.

**NOTE:** Energy Commission staff understand that the situation addressed by this calculation spreadsheet is not a "one size fits all" issue. Therefore, POUs do have the option to perform this calculation in a separate workbook, provided that this workbook is submitted to the Energy Commission with this form and all other materials required for verification and attested to on the attestation page.



## FOOTNOTES

1	Date	Enter the date of the generation. (for example, 01/01/2011; 01/02/2011, and so forth)
2	Hour Ending	Enter the hour ending for each hour. (1; 2; 3 and so forth) Only enter one row for each hour, regardless of the number of e-Tags.
3	Hourly Meter Data (MWh)	Enter the RPS-certified facility's meter data for this hour. This is the full output from the facility, reported in MWh. Include four decimal points to show kWh. There should only be one MWh amount per hour, and only one row per hour, regardless of the number of e-Tags.
4	Hourly Fixed Amount (MWh)	This is the fixed amount of electricity contracted for with the electrical generation facility.
5	Percent Share of Facility Generation Output (%)	This field is calculated automatically from the hourly generation and hourly fixed amount data.

CEC-RPS-Hourly CEC-RPS-Hourly Schedule 4 April 2013

April 2013



**(TO BE COMPLETED BY GENERATORS)**  
**REPORT to the CALIFORNIA ENERGY COMMISSION**  
**Report of Scheduled into a CBA - PCC 1 Claims**  
**Annual Hourly Comparison Spreadsheet for POU RPS Claims**  
**ATTESTATION FORM**

I am an authorized officer or agent of the load serving entity, as noted below, and hereby submit this report and attest to the following on behalf of said entity:

- 1) I am an authorized officer or agent of the load serving entity, as noted below and for which this report was prepared, and have authority to submit this report on behalf of said entity;
- 2) The information and data provided in this report, including information provided in Schedule 4 of this report, are submitted to the California Energy Commission for use in verifying the load serving entity's procurement claims of electricity products from the RPS-certified electrical generation facilities as identified in this report for purposes of the RPS and in accordance with the Energy Commission's *Renewables Portfolio Standard Eligibility Guidebook*;
- 3) To the best of my knowledge, none of the electricity generation identified in Schedule 4 of this report, nor any of the Renewable Energy Certificates, as defined in the *Renewables Portfolio Standard Eligibility Guidebook*, associated with the electricity generation for such claims, have been or will be used more than once to satisfy RPS procurement requirements or voluntary contributions;
- 4) I have read the *Renewables Portfolio Standard Eligibility Guidebook* and understand the provisions, eligibility criteria, and requirements of that guidebook and my responsibilities under the guidebook, including my responsibilities to provide additional information for RPS verification purposes if requested by the Energy Commission; and
- 5) I declare under penalty of perjury that the information and data provided in this report, including the information provided in Schedule 4 of the report and any supplement information as listed on the following line: \_\_\_\_\_ associated with these PCC1 hourly claims, is true and correct to the best of my knowledge.

Signed: \_\_\_\_\_ Dated: \_\_\_\_\_

Authorized Officer or Agent of Load Serving Entity	
<b>Name:</b>	
<b>Title:</b>	
<b>Phone:</b>	
<b>E-mail:</b>	
<b>Fax:</b>	
Load Serving Entity	
<b>Entity Name:</b>	
<b>Street Address:</b>	
<b>City, State, Zip Code</b>	

# City of Anaheim Detailed Comments on CEC Reporting Templates

## Appendix B

**File Name: CEC RPS eTag (APU  
Comments)**

8/16/2013

California Energy Commission  
Dockets Office, MS-4  
RE: Docket No. 13-RPS-01  
RPS Proceeding  
1516 Ninth Street  
Sacramento, CA 95814-5512




Via Email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

RE: The City of Anaheim Comments to the California Energy Commission's Renewable Portfolio Standard (RPS) Implementation for Local Publicly Owned Electric Utilities (POU's) in response to the July 29, 2013 Workshop

The City of Anaheim is pleased to submit comments on the templates and forms for RPS Compliance. The tabs in this Spreadsheet include Anaheim comments. Below are notes on how Anaheim comments are organized.

Anaheim is pleased to provide comments on the following tabs, for the file CEC RPS eTag (APU Comments):

1. CEC-RPS-E Tag Instructions
2. CEC-RPS-e Tag Attestation

KEY	NOTES	ICON
Items in Red Text Box	Data is already presented in other CEC Reports. A centralized database with all of the CEC reporting efforts is recommended, to prevent duplication of reporting data.	
Items in Blue Text Box	Data is not linked and linking is recommended, to streamline the reporting process.	
Items in Green Text Box	Clarification on data requirement or formatting questions.	



**(TO BE COMPLETED BY Publicly Owned Utilities)  
 REPORT to the CALIFORNIA ENERGY COMMISSION  
 CA RPS e-Tag Summary Report**

**Schedule 2 - PCC 1 - Not directly connected to a CBA e-Tag Summary**

**INSTRUCTIONS:** List the publicly owned utility's e-Tag information for the e-Tags used to demonstrate the final schedule data for PCC 1 REC claims from facilities not directly connected to a CBA.

**FOOTNOTES**

1	E-Tag ID	Enter the e-Tag Identification number (e-Tag Code).
2	Start Date	Enter the start date/time of energy flow during the query period.
3	Stop Date	Enter the stop date/time of energy flow during the query period.
4	Facility Name	Enter the Facility (Source) name as listed on the e-Tag. For PCC 1, the facility name should be the RPS-certified electrical generation facility generating the RECs. For the first compliance period only, if there is another source listed, the POU must provide a written explanation as to why this is the case and how staff can determine that the amount or percentage of the amount on the e-Tag is attributable to the specific RPS-certified electrical generation facility. Staff will evaluate the explanation to determine if the claim or a portion of the claim should be officially classified as PCC 1. For the second compliance period and forward, the source on the e-Tag must be the RPS-certified electrical generation facility for which the PCC 1 claims are made.
5	Load	Enter the Load as listed on e-Tag Load facility NERC registered as "sink point" aka Sink, Last Point of Delivery, POD. The Load must be within a CBA.
6	Load Control Area	Enter the Load Control Area (LCA) as listed on e-Tag. Note that the LCA must represent generation scheduled into a CBA. LCAs that are not also CBAs or are not located in CBAs should not be included.

## CA RPS e-Tag Summary Report

CEC-RPS-eTag (Revised 04/2013)

7	Generator Control Area	Enter the Generator Control Area (aka Generator Balancing Area) as listed on e-Tag. Note that for PCC 1 claims, this must be the GCA or, for the first compliance period, at a minimum, the BA where the RPS-certified electrical generation facility is located.
8	Load Serving Entity (PSE Sink)	Enter the Importing Entity listed on the e-Tag. This is the PSE from line of e-Tag with the "RPS ID" in the Miscellaneous token field.
9	Total MWh on Tag	Enter the Total MWh as listed on e-Tag for the time period (query period).
10	Used MWh	Enter the Used MWh. This is the MWh amount of scheduled electricity used from the e-Tag and matched to RECs. The "used MWh" amount should not be higher than the sum of the lesser of the hourly generation and hourly final schedule amounts for the timeframe on the e-Tag, but may account for the aggregation of fractional MWh from the hourly scheduling data.
11	MWh Remaining for Retirement	Enter the MWh remaining on the e-Tag. This is the number of MWh on the e-Tag not yet matched to RECs. If the amount remaining is zero, enter zero.
12	Miscellaneous Field	Enter the Miscellaneous token field RPS ID numbers, which may be a concatenation of up to 10 Miscellaneous token values all associated with the same line of the physical path. The RPS ID number of the facility for which the PCC 1 RECs are being claimed must be listed in the miscellaneous field.
13	WREGIS Certificate Serial Numbers	Enter the Certificate Serial Number of the WREGIS Certificate with which the e-Tag is matched and retired.
14	Optional Comments	Comments are optional, but may be helpful particularly in cases where there is aggregation of fractional MWh from the hourly scheduling data used to match WREGIS Certificates.

#13WREGIS Serial numbers are created when teh RECS are retired or placed in WREGIS, this data is not available when eTags are created.

### Schedule 3 - PCC 2 Incremental Electricity e-Tag Summary

**INSTRUCTIONS:** List the publicly owned utility's e-Tag information for e-Tags used to demonstrate the final schedule data for PCC 2 REC claims.

#### FOOTNOTES

## CA RPS e-Tag Summary Report

CEC-RPS-eTag (Revised 04/2013)

1	NERC Tag ID	Enter the e-Tag Identification number (e-Tag Code).
2	Start Date	Enter the start date/time of energy flow during the query period.
3	Stop Date	Enter the stop date/time of energy flow during the query period.
4	Generator Name	Enter the Generator (Source) name as listed on the e-Tag.
5	Load	Enter the Load facility NERC registered as "sink point" aka Sink, Last Point of Delivery, POD as listed on e-Tag. The Load must be within a CBA.
6	Load Control Area	Enter the Load Control Area (LCA) as listed on e-Tag. Note that the LCA must represent generation scheduled into a CBA. LCAs that are not also CBAs or are not located in CBAs should not be included.
7	Generator Control Area	Enter the Generator Control Area (aka Generator Balancing Area) as listed on e-Tag.
8	Total MWh on Tag	Enter the Total MWh on e-Tag for the time period (query period).
9	Used MWh	Enter the Used MWh. This is the MWh amount of scheduled electricity used from the e-Tag and matched to RECs.
10	MWh Remaining for Retirement	Enter the MWh remaining. This is the number of MWh on the e-Tag not yet matched to RECs. If the amount remaining is zero, enter zero.
11	Load Serving Entity (PSE Sink)	Enter the Importing Entity. This is the PSE from line of e-Tag with the "RPS ID" in the Miscellaneous token field.
12	Miscellaneous Field	Enter the Miscellaneous token field RPS ID numbers, which may be a concatenation of up to 10 Miscellaneous token values all associated with the same line of the physical path.
13	WREGIS Certificate Serial Numbers	Enter the Certificate Serial Number of the WREGIS Certificate with which the e-Tag is matched and retired.
14	Optional Comments	Comments are optional, but may be helpful particularly in cases where there is aggregation of fractional MWh from the scheduling data used to match WREGIS Certificates.

#13 WREGIS Serial numbers are created when the RECS are retired or placed in WREGIS, this data is not available when eTags are created.



(TO BE COMPLETED BY GENERATORS)  
REPORT to the CALIFORNIA ENERGY COMMISSION  
Report of Generation for California RPS Certified Facilities  
ATTESTATION FORM

I am an authorized officer or agent of the publicly owned utility, as noted below, and hereby submit this report and attest to the following on behalf of said entity:

- 1) I am an authorized officer or agent of the publicly owned utility, as noted below and for which this report was prepared, and have authority to submit this report on behalf of said entity;
- 2) The information and data provided in this report, including information provided in Schedule 2 and Schedule 3 of this report, are submitted to the California Energy Commission for use in verifying and classifying the publicly owned utility's procurement claims of electricity products represented by the e-Tag identification numbers identified in this report for purposes of the RPS and in accordance with the Energy Commission's *Renewables Portfolio Standard Eligibility Guidebook*;
- 3) To the best of my knowledge, none of the electricity products represented by the e-Tag identification numbers identified in Schedule 2 and Schedule 3 of this report, nor any of the Renewable Energy Certificates, as defined in the *Renewables Portfolio Standard Eligibility Guidebook*, associated with the electricity generation for such claims, have been or will be used more than once to satisfy RPS requirements or voluntary contributions;
- 4) I have read the *Renewables Portfolio Standard Eligibility Guidebook* and understand the eligibility criteria, and requirements of that guidebook and my responsibilities under the RPS and my responsibilities to provide additional information for RPS verification purposes to the California Energy Commission; and
- 5) I declare under penalty of perjury that the information and data provided in this report, including the information provided in Schedule 1 of the report, is true and correct to the best of my knowledge.

Anaheim supports the statement "best of my knowledge."

Signed: \_\_\_\_\_ Dated: \_\_\_\_\_

Name of Officer or Agent: \_\_\_\_\_

Title of Officer or Agent: \_\_\_\_\_

Authorized Officer or Agent of Load Serving Entity	
Name:	
Title:	
Phone:	
E-mail:	
Fax:	
Load Serving Entity	
Entity Name:	
Street Address:	
City, State, Zip Code	